



Douglas County Internal Audit

December 15, 2015

Douglas County Board of Commissioners
1819 Farnam Street, Suite LC2
Omaha, NE 68183

Attention: Mary Ann Borgeson, Mike Boyle, Jim Cavanaugh, Clare Duda, Marc Kraft,
PJ Morgan, and Chris Rodgers

Patrick Bloomingdale, Douglas County Chief Administrative Officer
1819 Farnam Street
Omaha, NE 68183

Dear Commissioners and Mr. Bloomingdale:

I have completed a performance audit of the County's business continuity plan. The purpose of the audit was to assess the adequacy and effectiveness of the County's business continuity program as a whole and at the individual departmental level. The audit revealed that the plan design was adequate, but the County was not effective in implementing it. Specific issues and recommendations for improvement to the business continuity plan appear in the Findings section below.

Background

Every organization is at risk from potential business disruptions that include natural disasters, utility and communication failures, and intentional attacks on buildings, infrastructure, and IT systems. It is imperative that local government be able to provide the essential services that are needed and expected by the citizens of Douglas County in the event of a disruption. Effective business continuity planning helps to ensure that the County will be able to continue serving its citizens in the event of a major disruption.

In 2011, the County contracted with FDI Consulting (FDI) to help prepare an effective business continuity plan. FDI worked with the County's elected officials and other County departments to produce a plan. The final product provided by FDI included a number of templates to be followed and filled-out by the individual departments and elected offices. There were two county-wide templates - the Continuity of Operations Management Program (COMP) Master Plan and the County Overall Site Plan (COSP). The template used for each of the individual County departments and elected offices is called a Continuity of Operations Plan (COOP). Thirty COOP plans were prepared.

Objective

The purpose of the audit was to assess the adequacy and effectiveness of the County's business continuity planning. Specific objectives included determining:

- The adequacy of the plan templates as compared to other readily available models such as FEMA's and other organizations and governments.
- The completeness of the individual plans that were in place.
- The effectiveness of the plans in light of any exercises or testing that had taken place.

Scope

The scope of the audit covered the plans that were in place as of the week of September 28, 2015. It was noted that the Sheriff, Youth Center, Corrections, 911 Communications and DOT.Comm have their own detailed plans for event disruptions. These were not included in the scope of the audit. This audit focused on the COMP, COSP, and COOP plans that were in place.

Methodology

Internal Audit obtained the COMP, COSP, and COOP plans from County Administration. The plan templates were compared to other plans obtained on the internet from the State of Oklahoma, the Massachusetts Institute of Technology, FEMA, and DisasterRecoveryPlanTemplate.org. Each of the plan templates emphasized certain areas over others, but all would accomplish the business continuity objectives if executed accordingly. The County's plans were comparable to the plans mentioned above and would be effective if the plan requirements were followed.

The individual templates obtained from County Administration were assessed to determine if they were properly completed and up-to-date. Internal Audit looked to see if the requirements of the plans were followed and that training and exercises were conducted as recommended in the COMP plan. Numerous deficiencies were cited for the plans as shown in the Findings section below:

Findings

Criteria: It is the responsibility of the Continuity Management Team identified in the COMP Master Plan to see that the County plan as a whole and its individual components are reviewed on a regular basis and updated as necessary. Updates include but are not limited to:

- Personnel and team assignments
- Contact lists
- Vital information and records
- Alternate recovery sites and requirements
- Assigned recovery time objectives
- Checklists and actions

Condition: The COMP, COSP, and COOP templates that were prepared included preprinted instructions as well as fields to record pertinent information. The COMP and COSP county-wide plans work in tandem and were assessed together as if they were one document. Exceptions in following plan requirements and filling out the templates follow:

COMP and COSP (County-Wide Plan)

- The final plan was not approved by County Officials.
- The Plan has not been updated since its initial preparation in 2011.
- The plan did not identify a Program Coordinator identified in the documents as the person who would keep the plan current.
- There have been no exercises or training conducted as required in the plan.
- The Continuity Management Team included members no longer working at the County; contact information was not included.
- Only job titles (i.e., not actual names) were included as members of the Impact Assessment Team; contact information was not included.
- The Continuity Administration Team included members no longer working at the County; contact information was not included.
- Only one member of the Continuity Management team had a copy of the COMP plan kept in a secure off-site location.
- A bridge telephone number and host code were not included in the plan.

COOP (Individual Departmental and Elected Official Plans)

- Three of the elected officials and one independent department not reporting to County Administration did not prepare plans.
- None of the COOPs had been updated since the initial preparation in 2011.
- Eight of the plans did not list any alternate recovery sites.
- There were no formal operating agreements in place with the six external entities identified as alternate recovery sites in four of the plans.
- Only one of the plans listed had a continuity team in which all of its members were current employees. It also included the contact numbers for the team. None of the others listed any contact phone numbers.
- None of the plans had a complete, updated list of software that would be needed for the recovery process.
- Two of the plans did not include any of the functions or services provided by their departments.
- Two of the plans did not list the vital records it would need for their recovery process. Five others did not list the specific files, reports, or forms it would need in the vital records section of their plans.
- Five plans did not list external contact information or it was incomplete, provided limited detail, or was not current.
- Three plans did not list their minimum operating requirements needed during the recovery process.
- Two plans did not list any of the equipment that would be needed during the recovery process.
- Only two of the plans were kept at secure off-site locations.

Effect: The County may not be adequately prepared for a business disruption.

Cause: The County did not devote adequate resources to complete and maintain its business continuity plans.

Recommendation: County Administration should complete the following tasks to provide for a more robust business continuity program:

- Identify a Program Coordinator who will work to ensure that all offices and departments have plans that are complete and kept current.
- At least every six months, verify that all information is current and update if necessary.
- County officials should approve the plans once they are completed.
- The County should conduct training and exercises to properly prepare for an actual event and to identify strengths and weaknesses in the current plans.
- Ensure that all electronic and hard copies of the plans are kept in secure off-site locations and the plans are the most current ones available.
- Ensure that all members of the teams identified in the plans have their own electronic and hard copies of the plans.
- Obtain formal agreements with the external entities identified in the alternate recovery sites and ensure the agreements are kept current.

Management Response: In the month of January the Claims and Safety Coordinator will contact the various operations for an update / enhancement to their previously submitted continuity plans.

Audit Standards

Internal Audit conducted this audit in accordance with Generally Accepted Government Auditing Standards and the International Standards for the Professional Practice of Internal Auditing. Those standards require that the audit is planned and performed to obtain sufficient, appropriate evidence to provide a reasonable basis for the findings and conclusions based on the audit objectives. Internal Audit believes that the evidence obtained provides a reasonable basis for its findings and conclusions based on the audit objectives. This report was reviewed with the Douglas County Chief Administrative Officer.

Internal Audit appreciates the excellent cooperation provided by the managers and staff of the various offices/departments throughout the County. If you have any questions or wish to discuss the information presented in this report, please feel free to contact me at (402) 444-4327.

Sincerely,

Mike Dwornicki
Internal Audit Director

cc: Jude Lui
Richard File
Mark Rhine
Daniel Esch
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